

January 12, 2011

#### FEDERAL EXPRESS

Mr. Robert G. Heiss, Director International Compliance Assurance Division Office of Federal Activities US Environmental Protection Agency Ariel Rios Building Room Number 6144 1200 Pennsylvania Avenue, NW Washington, DC 20004

Re:

Annual Report of Hazardous Waste Exports for 2011

EPA Notice ID: 003493/9E/11

Dear Mr. Heiss.

The enclosed Annual Report of Hazardous Waste Exports for 2011 is submitted as required by 40 CFR 262.56. This report summarizes the type, quantity, and ultimate destination of the "hazardous waste" exported last year. The "hazardous waste" in this case is kettle dross, malformed or damaged plates, scrap grid metal, and other lead-bearing scrap from the manufacture of lead-acid batteries sent for reclamation. Please note that under federal regulations, the referenced material would be exempt from classification as a hazardous waste under 40 CFR 261.2(c)(3), as a material being reclaimed. However, the Georgia Environmental Protection Division's Administrative Law Judge handed down a decision that, in essence, requires that by-products exhibiting a hazardous characteristic be classified and managed as hazardous waste until the material actually enters the reclamation process, rather than at the point the material is destined for reclamation, as discussed in the preamble to the original federal regulation.

Please let me know if you have any questions or need additional information.

Sincerely,

**Exide Technologies** 

Douglas W. Emerich

**EHS Manager** 

Enclosure

Mr. David Yardumian, Georgia Environmental Protection Division - Hazardous Waste Management Branch copy:

Mr. Joseph Bolea, EHS Director, Exide Technologies

Mr. Fred Ganster, EHS Director, Exide Technologies



From: (706) 685-7936 Doug Emerich

EXIDE706 3639 Joy Road

Columbus, GA 31906

Origin ID: CSGA

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BILL SENDER

SHIP TO: (202) 564-0025 Robert G. Heiss, Director **US Environmental Protection Agency** 1200 PENNSYLVANIA AVE NW **ARIEL RIOS BUILDING, ROOM 6144 WASHINGTON, DC 20004** 



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## Annual Report of Hazardous Waste Exports for 2011

#### 1. Primary Exporter (Consignor)

Name:

**Exide Technologies** 

Site and Mailing Address: 3639 Joy Road

Columbus, Georgia 31906

EPA ID No.:

GAD 070 330 576

#### 2. Consignee

Name:

La Corporation Newalta

Site and Mailing Address: 1200 Rue Garnier

Ville Ste-Catherine, Quebec

J5C 1B4

#### 3. Transporters

Transport Sylvester et Forget, Inc 320 Route 201 St Stanislas de Vostva, Ouébec JOS 1W0 (800) 665-6839

EPA ID No: MIK 143 526 901

#### 4. Wastes and Shipping Information

1. Description of Waste: Recyclable lead-bearing scrap from the manufacture of lead-acid batteries EPA hazardous waste numbers: D008, D006 US DOT proper shipping name, hazard class and ID number:

> Waste Corrosive Solid, acidic, inorganic, n.o.s., (sulfuric acid), 8, UN3260, PGII RQ (D008, D006)

Number of Shipments during the Calendar Year: 1 Total Quantity of this Waste Shipped: 7,972, lbs.

#### 6. Waste Minimization Statement

Submitted with Biennial Report pursuant to 40 CFR 262.41.

### 7. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Signature:

Name and Title: Charlie Runco, Plant Manager